

## **Privacy and Cookie Policy**

### **1 Introduction**

- 1.1 Acorn Insurance and Financial Services Limited t/a Acorn Insurance, registered in England and Wales with company number 01636368, whose registered office address is at 98 Liverpool Road Formby, Liverpool, Merseyside, L37 6BS (“We”) are committed to protecting and respecting your privacy.
- 1.2 This Privacy Policy describes our current policies and practices with regard to data concerning our customers which is collected by us.
- 1.3 We are committed to respecting the legal requirements that exist in the European Union regarding data privacy, including the United Kingdom Data Protection Act 1998 and Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 1.4 By visiting [www.acorninsure.co.uk](http://www.acorninsure.co.uk) you are accepting and consenting to the practices described in this policy.

### **2 Definitions**

- 2.1 In this Privacy Policy, the following words shall have the corresponding meanings:
- (a) “**Customer**” means any person (including individuals, firms and companies and other organisations) who is a customer of Acorn Insurance, including persons who browse, register on or otherwise use our website, or who purchase our Products;
  - (b) “**Customer Data**” means all data and information we collect, hold and/or process concerning our Customers and individuals who are their contacts or representatives;
  - (c) “**Personal Data**” means Customer Data that falls within the meaning of personal data under the Data Protection Act 1998, being data which relates to a living individual, who can either be identified from that data alone, or from that data in combination with any other information in our possession (for example, the name, age, email address or mailing address of an individual);
  - (d) “**You**” or “**your**” means the Customer in respect of whom we collect, hold or process any data from time to time;
  - (e) “**Website**” means all and any website operated by us from time to time, including our website [www.acorninsure.co.uk](http://www.acorninsure.co.uk) our purchasing web pages and our support forums, and to all information and services obtained through our website as the same change from time to time.

### **3 Customer Data**

We describe in detail below each type of Customer Data we collect, how we collect it and what we do with it.

#### **3.1 Customer Transaction Data**

- (a) **What it comprises**

This Customer Data comprises all data you provide or we otherwise collect or generate when you register with our Website, or purchase any Products from us, or when we or you communicate with in any other way with each other (such as support requests), including individual or corporate names, addresses, email addresses, card or other payment details, passwords and usernames, purchase and payment history and transaction records, contact details for any other individuals who are the representatives for any Customer who is a business or other organisation, and other messages and communications exchanged.

(b) **How we collect it**

We collect, generate, process such Customer Data when you register with or use our Website or purchase any Products from us or communicate with us, including where you complete any registration or order forms or submit any messages to us.

(c) **What we use it for**

We use such Customer Data for the following purposes:

(i) **Administration and Performance**

To manage and administer our relationship with you, including your registrations, transactions and communications with us, to perform all orders and contracts with you, to provide the Products and information you request, and to respond to your comments, questions and support requests, and to monitor compliance with and enforce the terms of our relationship and any contracts with you.

(ii) **Credit Checks and Fraud Prevention**

To carry out credit checks with reputable third party credit agencies and fraud prevention agencies and to run checks utilising industry fraud databases such as CIFAS and SIRA.

(iii) **Processing Your Insurance Quotation**

To share with other insurance companies for underwriting, claims, and premium collection purposes I can find any reference to us using third parry's to establish identity and credit worthiness and such as Experian also I think we need to mentions CUE and have the sections in for CIFAS and other fraud databases such as SIRA ?

(iv) **Marketing**

We may use your Customer Data, including your email and postal address, to send you marketing messages concerning our Products. However, if that Customer Data is Personal Data we will not do so unless you have consented to the same, or not opted out of this and you may withdraw your consent to use at any time any email address published on our Website.

(v) **Analysis and Improvement**

We may also use such Customer Data to carry out analysis and research in relation to our overall business performance, and to facilitate reviews, developments and improvements to the content and functionality of our Website and the Products we offer, to better

understand our customers and markets, to improve our products and services.

(vi) **Telephone Calls**

We may monitor and record telephone calls for the purpose of security and training.

3.2 **Click-Stream Data**

(a) **What it comprises**

This data comprises tracking of your use of our Website (including purchases you make and registrations), including for example which pages you view and which links you use. This information about your use of our Website is called “click-stream data.” Click-stream data does not identify you personally. If we link any click-stream data to your personal name we will treat it as Personal Data.

(b) **How we collect it**

We use technology running on our Website server and computers to monitor and capture click-stream data.

(c) **What we use it for**

Click-stream data is used to analyse the performance of our Website, to improve our Website, to help us determine what is important to you and what is not, to help us decide what content and features to add and what to discard, and to help us determine whether our Website is easy to use or whether we need to redesign certain pages and links.

3.3 **Cookies**

(a) **What they comprise**

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. For detailed information on the cookies we use and the purposes for which we use them please see paragraph (b) below.

(b) **What we use them for**

We may use cookies in two ways:

- (i) per-session cookies are used while you are logged on to our Website to record temporary data relating to your visit to our Website, to manage the delivery of web pages to you and any registration and ordering processes, and to help us monitor traffic through the Website; and
- (ii) logon and usage cookies store some data between visits to our Website in order to allow you to log on to your account more easily, and using them we are able to personalise your experience and create a database of your previous choices and preferences, and in situations where those choices or preferences need to be collected again, they can be supplied by us automatically, saving you time and effort. For example, after you purchase a product once, if you need to purchase it

again your previous selection of options will be retained and can be re-entered more quickly.

(c) **De-activating Cookies**

If you do not want to use “cookies” most internet browser programs will permit you to turn them off. Should you do this you will still be able to access most of our Website as normal, but some processes that depend on cookies may not work properly. Your computer may be specially configured to reject cookies: please refer to your browser for more information.

**4 Disclosure of Customer Data to Third Parties**

**4.1 Purposes of disclosure and recipients**

We do not share Customer Data with any third parties except as provided below or as required by law and where we share Personal Data with third parties this will be in accordance with clause 4.2 below:

(a) **Payment Processing**

Your Customer Data may be processed by third parties who provide order processing services to us and we may transfer Customer Data to third party payment processors in order to process payments for orders (such as credit and debit card processing companies). If we use a third party order processing service, they will collect and sent your data to us securely, which will then be incorporated into our databases.

(b) **Purposes of obtaining a Quote**

We will use your Customer Data (including your Personal Data) to obtain quotes from insurance underwriters to provide you with an insurance quote.

(c) **Our Contractors**

We may have your Customer Data processed by third parties throughout the world who act for or on our behalf; for example, we may use cloud computing or remote database hosting services which may be located anywhere in the world and we may engage contractors anywhere in the world for the purposes of providing support or back-office services to us, including website hosting, order processing, order fulfilment, application and database hosting, data processing services, or that help us market our products and services. These companies will process and hold information about you in order to perform their functions. These companies are not authorised to use the information they process for us for any other purpose than those to which we have notified you under this Privacy Policy.

(d) **Legal Requirements**

We may share or transfer your Customer Data to a government authority where required to comply with a legal requirement, for the administration of justice, or where reasonably required to protect you or your company’s vital interests.

(e) **Corporate Transfer**

We may transfer your Customer Data to any company that purchases or otherwise acquires our business in the event of a corporate sale, merger, reorganisation, dissolution or similar event.

(f) **Statistics**

We may use your Customer Data along with other data to provide statistics on an anonymous basis to our contractors, marketing partners (including banks and other institutions who may promote our Products to their customers), and other companies and organisations we deal with, for a range of purposes, including assessing and reporting on the overall performance of our Product and Website, assessing and reporting on overall Product take-up and usage, assessing and reporting on malware and unsafe websites and associated threats and risks in general or for any group of customers.

4.2 **Data Protection Act Requirements**

Before disclosing any Personal Data to a third party, we will contractually require the third party to take adequate precautions to protect that Personal Data against unauthorised use or disclosure and to process it only in accordance with our instructions or for the purposes for which it was disclosed. If we have any Personal Data processed outside the European Union we will comply with the requirements of the Data Protection Act 1998 and all other applicable data protection laws within the European Union in connection with such processing.

5 **Data Integrity and Security**

We will take commercially reasonable measures to maintain the integrity and security of Customer Data. We keep Customer Data only for as long as reasonably necessary for the purposes for which it was collected or to comply with any applicable legal reporting or document retention requirements. Our servers and our databases are protected by industry standard security technology, such as industry standard firewalls and password protection. Although we cannot guarantee against any loss, misuse, unauthorised disclosure, alteration or destruction of data, we try to prevent such unfortunate occurrences.

6 **Other Websites**

Our Website may contain hyperlinks to websites that are not operated by us or one of our Affiliates. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of these third party websites or any association with their operators. We do not control these websites and are not responsible for their data practices. We urge you to review the privacy policy posted on any website you visit before using the website or providing any personal information about yourself.

7 **Changes to this Privacy Policy**

We are continually improving and adding new functionality and features to our Website and Products. These ongoing improvements, and we will as changes in the law or changes in technology, may require changes to this Privacy Policy. We reserve the right to update or modify this Privacy Policy at any time without prior notice. We will notify changes to this Privacy Policy by posting an updated or modified version of this Privacy Policy on our Website. Your continued use of our Website or Products following any such change constitutes your agreement that Customer Data collected from or about you after the revised Privacy Policy is posted will be subject to the terms of the revised Privacy Policy. We will not apply changes to this Privacy Policy to any Customer Data collected before the revised Privacy Policy was posted on the Website.

8 **Questions about our Privacy Policy**

If you have any questions about this Privacy Policy or concerns about the way we process Customer Data please notify us using any email address published on our Website.

## 9 **Your rights**

9.1 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at any email address published on our Website.

9.2 Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 10 **Access to information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## 11 **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [dataprotection@acorninsure.co.uk](mailto:dataprotection@acorninsure.co.uk)